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LEGEG ROCKY FLATS

EG&G ROCKY FLATS, INC. ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

June 27, 1994

94-RF-06857

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Jessie M. Roberson Acting Assistant Manager for Environmental Restoration DOE, RFO

PROGRAMMATIC PRELIMINARY REMEDIATION GOAL USE FOR CONTAMINANT OF CONCERN SELECTION - SGS-378-94

Attn: N. I. Castaneda, S. R. Grace

On June 20, the Programmatic "Preliminary Remediation Goals" (PRGs) were delivered to the Department of Energy, Rocky Flats Field Office (DOE, RFFO) for their review and approval. These PRGs were calculated using default values specified in the Environmental Protection Agencies "Risk Assessment Guidance for Superfund, Part B." (RAGS-Part B). These PRGs will be used on a site-wide basis after they have been reviewed and approved by the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH). As stated in the PRG document, the PRGs will be used to:

- Support the CMS\FS process by allowing the development of remedial technologies and alternatives to proceed prior to completion of an Operable Unit (OU) specific Baseline Risk Assessment (BRA).
- Support the Contaminants of Concern (COC) selection process within the BRA by providing "Risk Based Concentrations".
- Support the CDH conservative screen within the BRA.
- Support the evaluation of sites where accelerated cleanup actions may be warranted.

On June 21, a meeting was held between EG&G and DOE where site-specific exposure factors were distributed and discussed. Site-specified exposure factors can be used to replace the more conservative RAGS-Part B default values in calculating PRGs. The use of these factors, would reduce the human health risks from all individual hazardous substance sites of site-specific exposure factors can be used to replace the more conservative RAGS-Part B default values in calculating PRGs of (IHSS) and could be used in the BRA, in the Feasibility Study Risk Assessment and in the development of Preliminary Remediation Goals.

In order to meet an accelerated schedule for the BRA, it is recommended that the sitespecific factors not be applied now to revise the PRGs so that work may proceed on the COC technical memorandum and the CDH conservative screen. The alternative to this is to stop

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work on the COC technical memorandum and the CDH conservative screen until the site-specific factors have been approved for use by DOE, EPA and CDH.

To assure that site-specific factors are taken into account at each of the OUs, these factors must be reviewed and approved for use in the exposure scenario technical memorandum. This will assure that the site-specific factors are made an integral part of the BRA. Also, since the detailed analysis of alternatives within the Feasibility Study is based on the site-specific risks within the BRA, the PRGs would be revised during the detailed analysis of alternatives to take into account site-specific exposure factors.

Please contact Rick Roberts at extension 8508 or John Hopkins at extension 8636 if you have any questions. A decision on EG&G's recommendation needs to be made by June 27 so that work is not stopped. Rick or John will be contacting you to discuss this issue.

S. G. Stiger

Director

Environmental Restoration Program Division EG&G Rocky Flats, Inc.

JKH:cb

Orig. and 1 cc - J. M. Roberson

cc:

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